

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,

ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS,

ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA,

ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

Civil Action No. 2:21-CV-00022-Z

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PARENTHOOD SOUTH
TEXAS, INC., PLANNED
PARENTHOOD CAMERON
COUNTY, INC., PLANNED
PARENTHOOD SAN ANTONIO,
INC.,

Defendants.

**DECLARATION OF HEATHER HACKER IN SUPPORT OF RELATOR'S
OPPOSITION TO PPFA'S MOTION FOR PROTECTIVE ORDER
AND FOR CLARIFICATION**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury as follows:

1. I am over the age of eighteen and am competent to make this declaration.

2. I reviewed the documents listed in the spreadsheet Defendant Planned Parenthood Federation of America (PPFA) attached as Exhibit B to their Motion for Protective Order.

3. I reviewed the documents that PPFA designated Attorney Eyes Only because it stated that they included a non-publicly identified Planned Parenthood employee. These documents are identified as Bates number PPFA00001391, PPFA00001393, PPFA00001545, PPFA00001651, PPFA00001936, PPFA00002056, PPFA00002061, PPFA00002180, PPFA00002184, PPFA00004588, PPFA00004710, PPFA00004868, PPFA00004937, and PPFA00005120.

4. I performed a Google search for each employee name I identified in the documents along with the words “Planned Parenthood.”

5. I found public information linking each individual named to Planned Parenthood in the first few hits of the Google search. Most often, it was the individual’s own LinkedIn profile that identified them as a current or former Planned Parenthood employee. Other times, there were press releases from Planned Parenthood including the person’s name. A few people were identified in news articles.

6. I saved these pages showing the public identification and can provide them to the Court if needed.

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I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct. Executed on September 21, 2022.

/s/Heather Hacker
Heather Hacker